REMARKS

Claims 1-20 are pending in the present application. In the Office Action dated March 27, 2001, Claims 1-20 were rejected under 35 U.S.C. § 103(a) for being obvious over Madnick (U.S. Patent No. 5,913,214) in view of Kurz, "Data Warehousing within Intranet: Prototype of a Web-Based Executive Information System," IEEE Database and Expert Systems Applications, September 1-2, 1997, pp. 627-632. Applicants respectfully traverse each of the Examiner's rejections.

The Examiner also objected to the title. Applicants have amended the title as suggested by the Examiner.

With respect to the Examiner's rejections of Claims 1-20, Applicants respectfully submit that Claims 1-20 are not obvious over Madnick in view of Kurz. The Examiner has not made a prima facie case of obviousness. Neither Madnick nor Kurz, alone or in combination, disclose or suggest a method of content conversion, particularly one that uses data mining. Applicants respectfully submit that the Examiner's reliance on Madnick and Kurz is based on improper hindsight analysis.

Claim 1 is directed a method of content conversion in which a first hypertext electronic document is received on a second network device on a first network from a third network device on a second network. A document object model is created from the first hypertext electronic document. Selected hypertext elements are extracted from the document object model using data mining expressions from a data mining conversion language. The extracted hypertext elements are converted using data mining operations from a data mining conversion language and a

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second hypertext electronic document including converted hypertext elements is created on the second network device.

Madnick discloses a system for querying disparate, heterogeneous data sources over a network. Some data sources may be World Wide Web ("WWW") pages or other semi-structured data sources. The system includes a query converter, a command transmitter, and a data retriever. The query converter produces, from a query, a set of commands which can be used to interact with a semi-structured data source. The command transmitter issues the produced commands to the semi-structured data source. The data retriever retrieves the desired data from the data source.

Kurz discloses an enterprise information system (EIS) based on a multi-dimensional modeled data warehouse (DWH). The EIS uses a relational online analytical processing engine (R-OLAP) to extract the raw data from the given multi-dimensional DWH. The R-OLAP then creates virtual mult-dimensional OLAP data cubes. Kurz discloses an information server that provides visualization of the retrieved OLAP data cubes in an easy understandable manner.

CLAIMS 1 - 14

Neither Madnick nor Kurz, alone or in combination, render the present invention as recited in Claim 1 obvious.

Madnick does not disclose the step of "extracting one or more selected hypertext elements from the document object model using one or more data mining expressions from a data mining conversion language." The Examiner compares "a HTML descriptor file containing additional embedded tags, said tags providing extra information to the Wrapper Generator" as recited in Madnick (col. 15, lines 54-65) with "extracting one or more selected hypertext

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elements from the document object model . . ." recited in Claim 1. The cited passage in Madnick however, does not disclose or suggest extracting hypertext elements from the document object model." *See* Madnick col. 15, lines 54-65.

The Examiner asserts that it would have obvious to one of ordinary skill in the art to implement data mining and a data mining conversion language because Madnick deals with various data extractions from disparate network sources for returning result sets of information. The Examiner, however, provides no evidence indicating that merely "dealing with data extractions . . . from disparate networks . . . for returning result sets of information" clearly suggests data mining. Moreover, there is clearly no disclosure or suggestion in Madnick or Kurz of the use of a data mining conversion language.

Neither Madnick nor Kurz, alone or in combination, teach or suggest the step of "creating a second hypertext document" as recited in Claim 1. The Examiner admits that Madnick does not teach or suggest the step of creating a second hypertext document as recited in Claim 1. The Examiner asserts however that Kurz teaches "final HTML output display" and therefore the step of "creating a second hypertext document." Applicants respectfully submit that merely disclosing a "final HTML output display" is insufficient to teach or even suggest creating a second hypertext document.

Applicants submit that the asserted combination of Madnick and Kurz is improper as based on hindsight analysis. There is no teaching or suggestion in either Madnick or Kurz to make the asserted combination. Indeed, one of ordinary skill in the art would not have been motivated to make the asserted combination because Madnick relates to retrieving data from heterogeneous data sources including structured sources and semi-structured sources; and Kurz

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on the other hand relates to retrieving data in a data warehouse modeled as a virtual n-dimensional data-cube. That is, the object of Madnick is to retrieve data from heterogeneous data sources, while that of Kurz is to retrieve data from one highly structured data source. The asserted combination would therefore have had no utility and therefore no desirability. The resulting combination would be inoperable due to the inconsistent objectives and functions of the two references. The asserted combination could only have been made using improper hindsight analysis with the present invention as a roadmap.

Applicants respectfully submit that neither Madnick nor Kurz, either alone or in combination teach or suggest the invention as claimed in Claim 1. Moreover, the Examiner has failed to make a prima facie case of obviousness because Madnick and Kurz have been improperly combined through hindsight analysis.

Applicants submit that Claim 1 is in condition for allowance. Claims 2-14 are dependent on independent claim 1 and are therefore also in condition for allowance. Favorable reconsideration is respectfully requested.

CLAIMS 15-19

Applicants respectfully submit that independent Claim 15 is also not obvious over Madnick in view of Kurz. Claim 15 recites "creating a second hypertext electronic document from one or more converted hypertext elements." Neither Madnick nor Kurz, alone or in combination, teach or suggest the step of "creating a second hypertext document" as recited in Claim 15. The Examiner admits that Madnick does not teach or suggest the step of creating a second hypertext document as recited in Claim 15. The Examiner asserts however that Kurz teaches "final HTML output display" and therefore the step of "creating a second hypertext

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document." Applicants respectfully submit that merely disclosing a "final HTML output display" is insufficient to teach or even suggest creating a second hypertext document.

Applicants further submit that Claim 15 is not obvious because the Examiner improperly combined Madnick and Kurz as discussed above with respect to Claim 1.

Applicants submit that Claim 15 is in condition for allowance. Claims 16-19 are dependent on independent claim 15 and are therefore also in condition for allowance. Favorable reconsideration is respectfully requested.

CLAIM 20

Applicants respectfully submit that independent Claim 20 is also not obvious over Madnick in view of Kurz. Claim 20 recites "a second hypertext document." Neither Madnick nor Kurz, alone or in combination, teach or suggest the "a second hypertext document" as recited in Claim 20. The Examiner admits that Madnick does not teach or suggest a second hypertext document as recited in Claim 20. The Examiner asserts however that Kurz teaches "final HTML output display" and therefore the existence of "a second hypertext document." Applicants respectfully submit that merely disclosing a "final HTML output display" is insufficient to teach or even suggest a second hypertext document.

Applicants further submit that Claim 20 is not obvious because the Examiner improperly combined Madnick and Kurz as discussed above with respect to Claims 1 and 15.

Applicants submit that Claim 20 is in condition for allowance. Favorable reconsideration is respectfully requested.

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Favorable consideration of these Remarks and passage to issuance is respectfully requested. If any further matters remain which can by resolved by an Examiner's amendment, the Examiner is encouraged to call the undersigned at (312) 913-2104.

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